

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**ERROL ADOLPHE,**

**Plaintiff,**

**vs.**

**SHELL OIL PRODUCTS  
COMPANY LLC,**

**Defendant.**

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**Civil Action No. 4:18-cv-00129**

**DECLARATION OF RICHARD W. BOHAN**

Pursuant to 28 U.S.C. § 1746, I, Richard W. Bohan, declare the following:

1. My name is Richard W. Bohan. I am over eighteen (18) years of age. I have never been convicted of a crime and I am fully competent and qualified to make this declaration. I have knowledge of the matters contained herein, and I am submitting this Declaration on behalf of Defendant Shell Oil Products Company LLC.

2. I am the Corporate Secretary for Shell Oil Company. In this role, I am familiar with the global structure of companies owned directly or indirectly by Royal Dutch Shell plc.

3. Based on records available to me, in 2017, an indirect subsidiary of Royal Dutch Shell plc, Shell Overseas Holdings Limited, divested itself of its interest in Shell Gabon Holdings Limited. Shell Gabon Holdings Limited held a 75% equity interest Shell Gabon S.A., with the other 25% interest held by ETAT GABONAIS, the government of Gabon. Royal Dutch Shell plc is a public limited company incorporated in England and Wales.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 15th day of February, 2019.

